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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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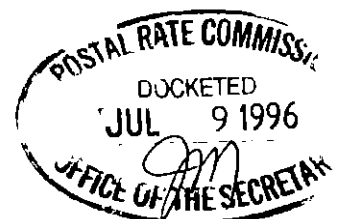
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications

Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE
STATEMENT OF ISSUES FOR DISCUSSION AT
PREHEARING CONFERENCE
(July 9, 1996)

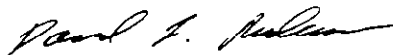
Ordering paragraph 4 of Order No. 1115 seeks participants' comments concerning the procedural schedule. The Office of the Consumer Advocate (OCA) requests that these proceedings not be expedited. The Postal Service does not request that these proceedings be accelerated, and the OCA is unaware of any reason to expedite these proceedings. At this juncture, the OCA believes that discovery from Postal Service witnesses concerning various topics including those cited below is likely to require some time. In addition, if the OCA or other participants decide to file testimony, it may be necessary to have an amount of time consistent with past non-expedited proceedings to prepare testimony.



Below are some of the substantive issues the OCA believes will have to be addressed during these proceedings.

1. What evidence is there on the criteria and standards employed by the Postal Service to determine which rates or fees should be changed between omnibus rates cases?
2. Has the Postal Service considered other options to a non-resident fee to eliminate the problems caused by non-resident box holders?
3. To what extent has the Postal Service contacted non-resident box holders to ascertain the reasons why they rent boxes outside of their ZIP Code area?
4. Do the proposed cost coverages for special services satisfy the criteria of §3622?

Respectfully submitted,



DAVID L. RUDERMAN
Attorney
Office of the Consumer Advocate

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.



DAVID RUDERMAN
Attorney

Washington, D.C. 20268-0001
July 9, 1996